

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

TAUREAN PROCH,

Case No. 2:22-cv-12141

Plaintiff,

District Judge Laurie J. Michelson
Magistrate Judge Patricia T. Morris

v.

SHERIFF MAT KING,
SERGEANT D. FLEMING,
LIEUTENANT R. OLEJNIK,
LIEUTENANT K. ADAMS,
SECURUS TECHNOLOGIES, INC.

Defendants.

**STIPULATION EXTENDING DATES FOR LIMITED DISCOVERY AND
DISPOSITIVE MOTION CUT-OFF**

The parties hereby stipulate and agree that they have been cooperative and diligent in conducting discovery on the limited issue of arbitrability, but additional time is needed due to issues of production unrelated to the parties' diligence. These issues include the need for obtainment of ESI from various sources, the difficulty in identifying responsive records because certain involved employees have left employment, as well as the Thanksgiving holiday and the upcoming holidays affecting staffing and availability.

The parties further stipulate and agree that the deadline for completing discovery as to the limited issue of arbitration should be extended from January 19,

2024, to February 19, 2024, and that the deadline to file dispositive motions on the issue of arbitration should be extended from February 9, 2024, to March 11, 2024.

The parties further stipulate and agree that discovery on all other issues in the case remains stayed pending the Court's ruling on the arbitration issue.

APPROVED AS TO FORM AND SUBSTANCE:

/s/ShelbyLeighton (w/permission)
Stowers

Shelby Leighton
PUBLIC JUSTICE
1620 L St. NW, Suite 630 Washington,
DC 20036
(202) 861-5254
sleighton@publicjustice.net
Attorney for Plaintiff

/s/Rhonda R.

Rhonda R. Stowers (P64083)
Plunkett Cooney
Attorney for Defendant Securus

/s/ Todd Shoudy (w/permission)

Todd Shoudy (P41895)
Fletcher Fealko Shoudy & Francis PC
Attorney for Defendants Adams,
Fleming, King & Olejnik

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

TAUREAN PROCH,

Plaintiff,

v.

SHERIFF MAT KING,
SERGEANT D. FLEMING,
LIEUTENANT R. OLEJNIK,
LIEUTENANT K. ADAMS,
SECURUS TECHNOLOGIES, INC.

Defendants.

Case No. 2:22-cv-12141

District Judge Laurie J. Michelson

Magistrate Judge Patricia T. Morris

**ORDER EXTENDING DATES FOR LIMITED DISCOVERY AND
DISPOSITIVE MOTION CUT-OFF**

This matter having come before the court on the stipulation of the parties, the parties having represented that they have been cooperative and diligent in conducting discovery on the limited issue of arbitrability, but additional time is needed due to issues of production unrelated to the parties' diligence, to include the obtainment of ESI from various sources and identification of responsive records being hindered because certain involved employees having left employment and further hindered by the Thanksgiving holiday as well as the upcoming holidays affecting staffing and availability, and the court being fully informed in the premises;

NOW THEREFORE, IT IS HEREBY ORDERED that the deadline for completing discovery as to the limited issue of arbitration is hereby extended from January 19, 2024, to February 19, 2024.

IT IS FURTHER ORDERED that the deadline to file dispositive motions on the issue of arbitration is hereby extended from February 9, 2024, to March 11, 2024.

IT IS FURTHER ORDERED that discovery on all other issues in the case is stayed pending a ruling on the arbitration issue.

IT IS HEREBY ORDERED.

Date: December 14, 2023

s/ PATRICIA T. MORRIS
Patricia T. Morris
United States Magistrate Judge